

Attorneys admitted in
California, New York,
Texas, Pennsylvania, and
Maine

Sender's contact:
scott@donigerlawfirm.com
(310) 590-1820



Doniger / Burroughs Building
603 Rose Avenue
Venice, California 90291

Doniger / Burroughs NY
224 Newman Avenue, Suite 413
Brooklyn, New York 11222

May 26, 2021

DELIVERED VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAY 27 2021

Case Title: *Lixenberg v. Oath Inc., et al.; 1:20-cv-07176-GBD-RWL*
Re: Request to Extend Dismissal Deadline

Your Honor:

As you know, our office represents Plaintiff Dana Ruth Lixenberg ("Lixenberg") in this action. We write to respectfully request an extension of the deadline for dismissal. Lixenberg requested consent from Defendant Oath, Inc., but no response has been received yet. On April 22, 2021, the parties filed a Notice of Settlement with the court indicating that they intended to file a stipulation of dismissal with prejudice within 30 days. (Dkt. #24.) The Court then issued an order of discontinuance directing the parties to either submit a stipulation of dismissal or a status report within thirty days of the Court's order. (Dkt. #25.)

The parties have fully executed the settlement agreement but need additional time to discharge certain obligations pursuant to the agreement. The parties respectfully request that the deadline to file the stipulation of dismissal with prejudice be extended by an additional 14 days, from May 26 to June 9, to allow time for this. This is the first request for an extension of the deadline for dismissal with prejudice.

We thank Your Honor for your time and consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs
Laura M. Zaharia
DONIGER / BURROUGHS
For the Plaintiff